

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE ALTA MESA RESOURCES, INC.
SECURITIES LITIGATION

No. 4:19-cv-00957

ALYESKA MASTER FUND, L.P.,
ALYESKA MASTER FUND 2, L.P., and
ALYESKA MASTER FUND 3, L.P.,

Judge George C. Hanks, Jr.

Plaintiffs,

v.

ALTA MESA RESOURCES, INC., *et al.*

Defendants.

ORBIS GLOBAL EQUITY LE FUND
(AUSTRALIA REGISTERED), ORBIS
GLOBAL EQUITY FUND (AUSTRALIA
REGISTERED), ORBIS GLOBAL
BALANCED FUND (AUSTRALIA
REGISTERED), ORBIS SICAV, ORBIS
INSTITUTIONAL GLOBAL EQUITY
L.P., ORBIS GLOBAL EQUITY FUND
LIMITED, ORBIS INSTITUTIONAL
FUNDS LIMITED, ALLAN GRAY
AUSTRALIA BALANCED FUND,
ORBIS OEIC, and ORBIS
INSTITUTIONAL U.S. EQUITY L.P.,

No. 4:22-cv-2590

Plaintiffs,

v.

ALTA MESA RESOURCES, INC., *et al.*,

Defendants.

**BAYOU CITY ENERGY MANAGEMENT, LLC'S
MOTION FOR LEAVE TO FILE UNDER SEAL EXHIBIT C TO ITS
OBJECTION TO TRIAL BY CONSENT AND MOTION TO EXCLUDE**

Bayou City Energy Management, LLC ("BCE") respectfully requests leave to file an unredacted copy of Exhibit C to its Objection to Trial by Consent and Motion to Exclude under seal. The Sealed Document is a report marked confidential that was prepared at the direction of the AMH Trustee in connection with the bankruptcy proceedings. Because this report contains an identifier suggesting it contains confidential analysis, it meets the requirements of the protective order.¹ Out of an abundance of caution, BCE requests leave to file this Exhibit C under seal.²

For the reasons set forth herein, BCE requests that the Court issue an order, granting this Motion and such other relief as may be just and proper.

¹ The Court entered the Stipulation and Protective Order (the "Protective Order") on August 7, 2021. ECF No. 190. The Protective Order provides for a "Confidential" designation that may be applied to a document that "contains information that is proprietary, commercially sensitive, or composed of trade secrets or commercial information that is not publicly known, or other information required by law or agreement to be kept confidential." *Id.*, ¶ 4.

² BCE does not object to the Sealed Document being filed publicly.

DATED: October 16, 2024

/s/ Kenneth A. Young

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***Counsel for Bayou City Energy Management,
LLC and William McMullen***

CERTIFICATE OF SERVICE

I certify that the foregoing document was served on all counsel of record via the Court's electronic filing system on October 16, 2024.

/s/ Kenneth A. Young

Kenneth A. Young